

REMARKS

Claims 1-19 are all the claims pending in the application. By this Amendment, claim 1 has been amended to avoid antecedent basis issues. Applicants submit that the amendment does not narrow the scope of the claim in any way, and thus does not create any estoppel. Also, by this Amendment, new claims 16-19 have been added.

Allowable Subject Matter

Applicants thank the Examiner for indicating that claims 9-10 and 12-13 contain allowable subject matter and would be allowed if rewritten in independent form. However, Applicants respectfully request the Examiner to hold in abeyance such rewriting of the claims until the Examiner has had an opportunity to reconsider and withdraw the rejection of the other claims.

Claim Rejections - 35 U.S.C. § 102

Claims 1-8, 11, and 14-15 are rejected under 35 U.S.C. § 102(b) as allegedly being anticipated by U.S. Patent No. 4,375,584 to Muzumdar *et al.* ("Muzumdar"). For *at least* the following reasons, Applicants respectfully traverse the rejection.

Applicants respectfully submit that claim 1 is not anticipated by Muzumdar. For example, claim 1 relates to a key telephone set. The key telephone set comprises, *inter alia*, (1) a telephone main body **comprising a handset placing unit**, (2) an interchangeable dial button unit attached to said telephone main body, and (3) an interchangeable line button unit attached to said telephone main body. The components (1)-(3) are structured so that said interchangeable dial button unit and said interchangeable line button unit are detachable from said telephone body **without disassembly of said telephone main body**.

The Examiner contends that in FIGS. 1 and 17 of Muzumdar, the base 12 suggests the telephone main body, and the dial keys 22 and line keys 24 correspond to the interchangeable dial button unit and the interchangeable line button unit of claim 1, respectively. Moreover, the Examiner maintains that from col. 5, line 48 to col. 7, line 28, Muzumdar discloses that the dial keys 22 and line keys 24 of the telephone keyset instrument 10 in Muzumdar are detachable from the telephone main body of the keyset instrument 10 “via cables, plugs, and receptacles” without disassembly of the telephone main body (Office Action at page 2).

In the Amendment filed on March 23, 2007, Applicants pointed out that in Muzumdar, the base 12 is disassembled to remove the key switch PC board 64 (which includes the dial keys 22 and the line keys 24). Specifically, Applicants explained that Muzumdar discloses that the handset 28 can no longer be placed on the main housing 16 when the key switch PC board 64 is detached from the base 12. Therefore, Muzumdar cannot disclose or suggest an interchangeable dial button unit, an interchangeable line button unit, and an interchangeable display unit that are detachable from said telephone body *without disassembly of said telephone main body*.

In response to the arguments, in the Final Office Action dated June 18, 2007, the Examiner asserted that claim 1 does not recite specific structure of the claimed telephone main body (Final Office Action, page 4). Accordingly, in order to place the application in immediate condition for allowance, Applicants amended claim 1 to recite that the telephone main body comprises a handset placing unit in the previous Amendment filed on September 17, 2007¹.

However, in the current Office Action, the Examiner alleges that upon further review of the Muzumdar reference, “the Examiner noticed that the telephone main body includes the base

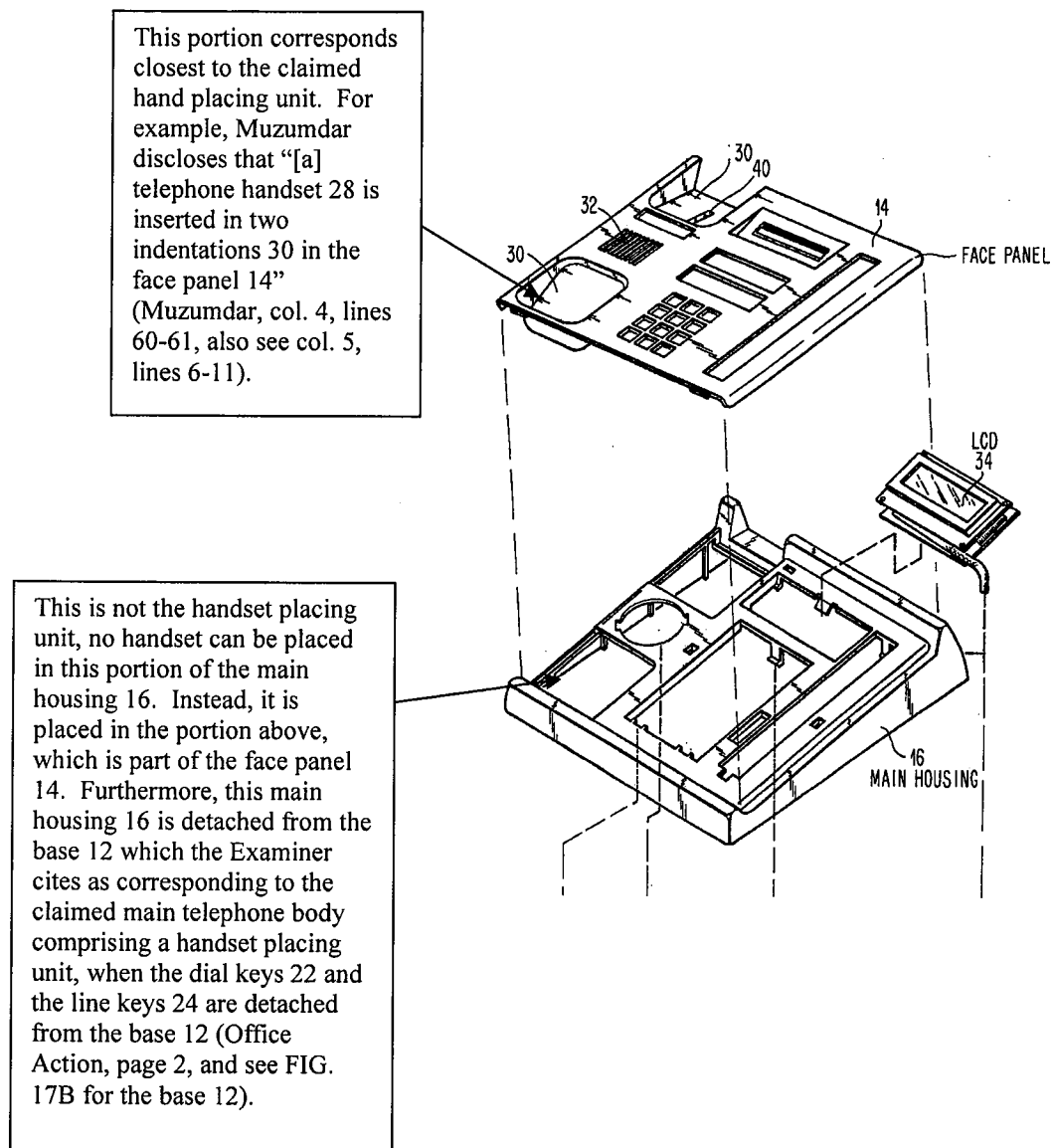
¹ The amendment was entered by virtue of the RCE filed on November 17, 2007.

(12) including a placing unit as shown by figs. 17A, 17B. As shown in fig. 17A, the main housing (16) includes handset placing unit (cut-outs associated with main housing, 16) for which the interchangeable unit(s) can be positioned thereon and further fig. 17B shows that the PC board(s) are removable without disassembling the base (12). Therefore, the rejection is maintained” (Office Action, page 4). Applicants respectfully disagree and respectfully submit that the Examiner is misinterpreting the teachings of Muzumdar.

The base 12, which the Examiner alleges as disclosing the claimed telephone main body (Office Action, page 2), does not include any handset placing unit (e.g., see FIG. 17B of Muzumdar where base 12 does not include the indentations 30 in which the handset is inserted, i.e., a handset placing unit). Moreover, with respect to the Examiner’s assertion that the main housing 16 includes a handset placing unit, Applicants respectfully submit that this is also not the case in Muzumdar. Rather, the handset placing unit is part of the face panel 14 in Muzumdar. As shown in FIGS. 17A and 17B, in order to detach the dial keys 22 and line keys 24, the base 12, the main housing 16, and the face panel 14 are disassembled.

Therefore, even assuming *arguendo* that a combination of the base 12 and the main housing 16 discloses the claimed telephone main body, this would still not satisfy the claimed limitation of the interchangeable dial button unit and the interchangeable line button unit being detachable from said telephone body without disassembly of said telephone main body. The handset 28 in Muzumdar can no longer be placed on the main housing 16 when the key switch PC board 64 (which includes the dial keys 22 and the line keys 24) is detached from the base 12.

An annotated version of FIG. 17A of Muzumdar, reproduced below, highlights the deficiencies in Muzumdar with respect to claim 1.



In view of the foregoing, Applicants respectfully request withdrawal of the 35 U.S.C. § 102(b) rejection.

Since claims 2-8 and 14-15 depend from claim 1, Applicants respectfully submit claims 2-8 and 14-15 are patentable *at least* by virtue of their dependency.

In addition, Applicants point out that in the previous Amendment, it was submitted that claim 14 is patentable for reasons other than its dependency (see Amendment filed September

17, 2007 on page 8, starting from 4th full paragraph). However, the Examiner did not respond to these arguments.

MPEP § 707.07(f) states that “[w]here the applicant traverses any rejection, the examiner should, if he or she repeats the rejection, take note of the applicant's argument and answer the substance of it”. Accordingly, Applicants respectfully request the Examiner to address the Applicants arguments in the previous Amendment related to claim 14. For the Examiner’s convenience, the arguments are reproduced below.

Claim 14 recites that the interchangeable dial button unit, the interchangeable line button unit and the interchangeable display unit are independent of each other. The Examiner alleges that FIGS. 1-2, col. 7, lines 29-44, and col. 8, lines 54-60 disclose this feature. Applicants respectfully disagree.

As discussed above with respect to claim 1, Muzmudar discloses that the key switch PC board 64 includes the dial keys 22 and the line keys 24. The dial keys 22 or the line keys 24 cannot be individually detached from the keyset instrument 10 of Muzmudar. They are collectively detached from the keyset instrument 10. Therefore, the dial keys 22 and the line keys 24 are not independent of each other as the Examiner alleges.

Claim 11 recites a key telephone system comprising, *inter alia*, a telephone set that comprises a telephone main body, an interchangeable dial button unit, and an interchangeable line button unit that are structured so that said interchangeable dial button unit, and said interchangeable line button unit are detachable from said telephone body *without disassembly of said telephone main body*. The telephone main body comprises a handset placing unit. As such, Applicants respectfully submit claim 11 is patentable for *at least* reasons analogous to those given above with respect to claim 1.

New claims

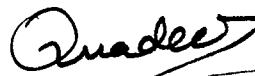
New claims 16-19 are patentable *at least* by virtue of their dependency. Moreover, the prior art of record does not disclose or suggest that said interchangeable line button unit is detachable from said telephone main body without detaching said interchangeable dial button unit as set forth in claims 16 and 17. In addition, as the Examiner already acknowledges with respect to claim 12, the prior art of record does not disclose or suggest that said interchangeable line button unit is attached to said telephone main body with a first sliding attachment mechanism, which is also recited in new claim 18.

Conclusion

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



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